

217/782-2113

"RENEWAL"
TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT¹

PERMITTEE

MeadWestvaco Packaging Systems LLC
Attn: Mike Hembrough
9540 South Dorchester Avenue
Chicago, Illinois 60628

Application No.: 95060151 I.D. No.: 031600CKM
Source Location: 9540 South Dorchester Avenue, Chicago, Cook County
Operation of: Flexographic and Rotogravure Printing
Date Received: April 18, 2003
Date Issued: May 19, 2004 Expiration Date²: May 19, 2009
Responsible Official: G. Brian Porrett, Plant Manager

This permit is hereby granted to the above-designated Permittee to operate a Packaging Production Plant; Printed Packaging Cartons, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

If you have any questions concerning this permit, please contact Sunil Suthar at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:SIS:psj

cc: Illinois EPA, FOS Region 1
CES
Lotus Notes

1 This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 - federal PSD and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

2 Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

MeadWestvaco Packaging Systems LLC
9540 South Dorchester Avenue
Chicago, Illinois 60628
773/731-9500

I.D. No.: 031600CKM
Standard Industrial Classification: 2657, Folding Paperboard
Boxes, Including Sanitary

1.2 Owner/Parent Company

MeadWestvaco Corporation
One High Ridge Park
Stamford, Connecticut 06905

1.3 Operator

MeadWestvaco Packaging Systems LLC
1040 West Marietta Street N.W.
Atlanta, Georgia 30318

Operator Contact: Mike Hembrough
Contact Phone: 773/731-9500

1.4 General Source Description

The MeadWestvaco Packaging Systems LLC located in Chicago, Cook County, Illinois (MEAD-Chicago) is located in a severe ozone nonattainment area, and is considered a major source based on potential volatile organic material (VOM) emissions in excess of 25 tons per year. The primary VOM emitting units at MEAD-Chicago are the flexographic and rotogravure printing presses. Potential emissions of all other regulated air contaminants from MEAD-Chicago are less than major source thresholds. MEAD-Chicago manufactures folding cartons used for secondary packaging primarily by the beverage industry. The cartons are manufactured from natural Kraft paperboard and coated Kraft paperboard. Rolls of paperboard are first printed with graphic arts using one of the printing presses at the plant. The paperboard then passes through a die cutter that cuts the printed paperboard to the size and shape for the package being produced. Cut paperboard then passes through a series of folders/glue lines, which fold the paperboard into the desired carton shape, and an adhesive may be applied to the carton so that it may maintain its final form. Finally, the cartons are packaged in boxes and stored until shipped.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

Act	Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
cfm	Cubic feet per minute
CFR	Code of Federal Regulations
ft ³	Cubic feet
gal	Gallon
gr	Grains
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
kW	kilowatts
l	liter
lb	pound
MACT	Maximum Achievable Control Technology
MG	Megagram
mmBtu	Million British thermal units
mo	Month
MW	Megawatt
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
PSD	Prevention of Significant Deterioration
scf	Standard cubic feet
scm	Standard cubic meter
SO ₂	Sulfur Dioxide
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a) (1) and 201.211, as follows:

- 1 - 6,000 Gallon Glue Storage Tank
- 8 - Glue Application Activities
- 6 - Ink Jet Printers
- 1 - 7,000 Gallon Varnish Storage Tank
- 1 - Die making, plate preparation operation
- 1 - Diluent Preparation and Ink Blending Operation
- 1 - Magnus Tank and Rinse Tanks
- 2 - Ultra Sonic Tanks and Rinse Tanks
- 1 - Off-Press Cleanup Activity

3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a) (2) or (a) (3), as follows:

- 1 - Plate Soak Tank - 201.210(a) (3)

3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a) (4) through (18), as follows:

Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a) (4)].

Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of less than 100,000 gallons per year, provided the storage tank is not used for the storage of gasoline or any material listed as a HAP pursuant to Section 112(b) of the CAA [35 IAC 201.210(a) (10)].

3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

3.2 Addition of Insignificant Activities

- 3.2.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).
- 3.2.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.
- 3.2.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
Unit 01	Flexographic Printing Press #297 with 7.4 mmBtu/hr Natural Gas Fired Dryer	12/80 Last Modified 9/93	None
	Rotogravure Printing Press #507 with 8.0 mmBtu/hr Natural Gas Fired Dryer	2/73 Last Modified 12/96	None
	Rotogravure Printing Press #417 with 8.0 mmBtu/hr Natural Gas Fired Dryer	2/73 Last Modified 7/93	None
Unit 02	By-Product Paperboard Separator (Recovery Unit)	7/95	Paperboard Baghouse
Unit 03	Natural Gas Fired Make-Up Heaters with Combined Maximum Firing Rate of 19.4 mmBtu/hr	11/91	None
Unit 04	Flexographic Printing Press #3120 with Natural Gas-Fired Drying Systems (Total Capacity: 7.5 mmBtu/hour)	June, 2002	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

- 5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM emissions.
- 5.1.2 This permit is issued based on the source not being a major source of HAPs.

5.2 Applicable Regulations

- 5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.
- 5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:
 - a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.

- b.
 - i. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)].
 - ii. The operating program shall be amended from time to time by the Permittee so that the operating program is current. Such amendments shall be consistent with the requirements set forth by this Condition and shall be submitted to the Illinois EPA [35 IAC 212.312].
 - iii. All normal traffic pattern roads and parking facilities located at this source shall be paved or treated with water, oils, or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils, or chemical dust suppressants shall have the treatment applied

on a regular basis, as needed, in accordance with the operating program [35 IAC 212.306].

- c. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.

5.2.3 The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.2.4 This permit is issued based upon this source being an area source of HAP(s) emissions, as defined in 40 CFR 63.2 and 40 CFR 63.820(a)(2) at which publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses are operated. As a result, the Permittee shall comply with the National Emission Standards for the Printing and Publishing Industry, pursuant to 40 CFR 63.820(a)(2), (3), (4), (5), (6) and (7), Subpart KK and the general provision requirements of Subpart A, as specified in Subpart KK.

5.2.5 This stationary source, as defined in 40 CFR Parts 63.2, Subpart A, and 63.820(a)(2), Subpart KK, is subject to 40 CFR Part 63. This stationary source shall certify compliance with the requirements of Parts 63.2 and 63.820(a)(2) as part of the annual compliance certification as required by 40 CFR Part 70 or 71.

5.3 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

- 5.4.1 The Permittee shall use less than 9.1 Mg (10 tons) of each HAP and less than 22.7 Mg (25 tons) of any combination of HAP at the source per each rolling 12-month period. This shall include material used for source categories of purposes other than printing and publishing. This shall exclude material used in routine janitorial or source grounds maintenance, personal uses by employees or other persons, the use of products for the purpose of maintaining electric, propane, gasoline and diesel powered motor vehicles operated by the source, and the use of HAP contained in intake water (used for processing or noncontact cooling) or intake air (used either as compressed air or for combustion) [40 CFR 63.820(a)(2)(i) and (ii) and (a)(4)].

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	262.17
Sulfur Dioxide (SO ₂)	0.13
Particulate Matter (PM)	1.54
Nitrogen Oxides (NO _x)	21.8
HAP, not included in VOM or PM	---
TOTAL	285.64

5.5.2 Emissions of Hazardous Air Pollutants

The emissions of HAPs from the source shall be less than 10 tons/year for each individual HAP and 25 tons/year for all HAPs combined. Compliance with these limits shall be based on a running total of 12 months of data, with emissions calculated using standard USEPA methodology, e.g., by appropriately summing the product of the weight

percent of each HAP by the weight of each HAP present in each HAP containing material used, on a monthly basis.

This condition is being imposed at the request of the Permittee so that the source is not a major source of HAP emissions and the major source MACT requirements of 40 CFR 63 Subpart KK - National Emission Standards for the Printing and Publishing Industry do not apply to the source.

5.5.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, Illinois EPA rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.

5.6.2 The Permittee shall maintain records of all required measurements and calculations needed to demonstrate compliance with the criteria of 40 CFR 63.820(a)(2), as specified in Condition 5.4.1, to verify that the source is not a major source for HAP emissions and therefore not subject to the MACT requirements of 40 CFR 63, Subpart KK, including the following:

- a. Mass of each HAP containing material used, lb/mo;
- b. Mass fraction of HAP present in each HAP containing material used, wt % HAP;
- c. Emissions and supporting calculations of each individual HAP used, lb/mo; and
- d. Emissions and supporting calculations of all HAP used, lb/mo.

The compliance date for a source subject to these provisions is May 30, 1999.

5.6.3 Records for Operating Scenarios

N/A

5.6.4 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the permit requirements as follows, pursuant to Section 39.5(7)(f)(iii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

5.7.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year.

5.7.3 The Permittee shall submit an annual report to the Illinois EPA, Compliance Section, on HAP emissions from the source, including the following information, so as to demonstrate whether the source is being operated as a non-major source of HAP emissions. This report shall be submitted with the Annual Emissions Report (Condition 9.7).

- a. The annual emissions of individual HAPs for each month of the previous calendar year sufficient to demonstrate compliance with the 12 month running total of Condition 5.5.2, tons/year (e.g., for the month of January, the emissions from February of the

preceding calendar year through January; for the month of February, the emissions from March of the preceding calendar year through February; 12 months in all); and

- b. The total emissions of all HAPs combined for each month of the previous calendar year sufficient to demonstrate compliance with the 12 month running total of Condition 5.5.2, tons/year (e.g., for the month of January, the emissions from February of the preceding calendar year through January; for the month of February, the emissions from March of the preceding calendar year through February; 12 months in all).

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Emissions

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7, and Compliance Procedures in Section 7 (Unit Specific Conditions) of this permit.

6.0 EMISSION REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

The ERMS is a "cap and trade" market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary sources to contribute to further reasonable progress toward attainment, as required by Section 182(c) of the Clean Air Act.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Under the ERMS, participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set during initial issuance of the sources' CAAPP permit. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emission reduction from stationary sources required for further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source should have sufficient ATUs in its account to cover its actual VOM emissions during the preceding season. An account's balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the account database. The Illinois EPA will then retire ATUs in sources' accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 IAC 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emission reductions from an Emission Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the Alternative Compliance Market Account (35 IAC 205.710). A source may also transfer or sell the ATUs that it holds to other sources or participants (35 IAC 205.630).

This section becomes federally enforceable upon approval of the ERMS by USEPA as part of Illinois' State Implementation Plan.

6.2 Applicability

This source is considered a "participating source" for purposes of the ERMS, 35 IAC Part 205.

6.3 Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 IAC 205.150(c)(1) and 205.720, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than its VOM emissions during the preceding seasonal allotment period (May 1 - September 30) not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 6.4.
 - i. VOM emissions from insignificant units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;
 - ii. Excess VOM emissions associated with startup, malfunction or breakdown of an emission unit as authorized elsewhere in this permit, in accordance with 35 IAC 205.225;
 - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);
 - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and
 - v. VOM emissions from certain new and modified emission units as addressed by Section 6.7(b), if applicable, in accordance with 35 IAC 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

6.4 Market Transaction

- a. The source shall apply to the Illinois EPA, and obtain a Transaction Account prior to conducting any market transactions, pursuant to 35 IAC 205.610.
- b. The source shall have at least one account officer designated for its Transaction Account pursuant to 35 IAC 205.620(a).
- c. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and

approved by the Illinois EPA in accordance with 35 IAC 205.620 and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

6.5 Emission Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.3, it shall provide emissions excursion compensation to the Illinois EPA in accordance with the following:

- a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by notice, as follows:
 - i. The purchase of ATUs shall be in an amount equivalent to 1.0 times the emissions excursion during the 1999 seasonal allotment period;
 - ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emission excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.
- b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.
- c. Pursuant to 35 IAC 205.720(c), within 15 days of receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

6.6 Quantification of Seasonal VOM Emissions

- a. The methods and procedures specified in Section 5 and 7 of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions [35 IAC 205.315(b)]:

No exceptions

- b. The Permittee shall report emergency conditions at the source to the Illinois EPA in accordance with 35 IAC 205.650, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS.

These reports shall include the information specified by 35 IAC 205.650(a), and shall be submitted in accordance with the following:

- i. An initial emergency condition report within two days of the time when such excess emissions occurred due to the emergency; and
- ii. A final emergency condition report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

6.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emission Report, seasonal VOM emission information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:
 - i. Actual seasonal emissions of VOM from the source;
 - ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;
 - iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in Section 205.337 of this Subpart;
 - iv. If a source has experienced an emergency, as provided in 35 IAC 205.650, the report shall reference the associated emergency conditions report that has been approved by the Agency;
 - v. If a source's baseline emissions have been adjusted due to a variance, consent order or CAAPP permit compliance schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and
 - vi. If a source is operating a new or modified emission unit for which three years of operational data are not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.

- b. This report shall be submitted by November 30 of each year, for the preceding seasonal allotment period.

6.8 Allotment of ATUs to the Source

- a.
 - i. The allotment of ATUs to this source, as it is a participating source, is 632 ATUs per seasonal allotment period.
 - ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 71.69 tons.
 - A. This determination includes the use of 1996 and 1997 as baseline seasons. This determination includes use of the 1997 season as a substitute for the 1994 and 1995 seasons due to non-representative conditions in this season as allowed by 35 IAC 205.320(a).
 - B. This determination includes adjustment to actual emissions to account for voluntary over-compliance at the source, e.g., low VOM containing inks, pursuant to 35 IAC 205.320(d) as further addressed in Section 7 of this permit.]
 - iii. The source's allotment reflects 88% of the baseline emissions (12% reduction) except for the VOM emissions from specific emission unit excluded from such reduction pursuant to 35 IAC 205.405 including units complying with MACT or using BAT, as identified in Section 7 of this permit.

b. Contingent Allotments

Contingent allotments for this source may come as a result of Construction Permit 97060113, that allows for the construction of printing line #826, pursuant to the condition of the construction permit and the conditions of section 7 of this permit.

- c. Pursuant to 35 IAC Part 205, the Illinois EPA will issue ATUs to the source consistent with the above allotment of ATUs specified in Condition 6.8(a)(i), annually. These ATUs will be valid for the seasonal allotment period for which they are issued and, if not used for VOM emissions in this season, the following seasonal allotment period. Notwithstanding the above, part or all of the above allotment of ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:

- i. Transfer of ATUs from the allotment by the source to another participant or the ACMA, in accordance with 35 IAC 205.530;
- ii. Deduction of ATUs from the allotment as a consequence of emission excursion compensation, in accordance with 35 IAC 205.620; and
- iii. Transfer of ATUs from the allotment to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

6.9 Recordkeeping for ERMS

The Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of ERMS [35 IAC 205.600(a)]:

- a. Seasonal component of the Annual Emission Report;
- b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a);
- c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit 01: Flexographic and Rotogravure Printing Lines Control: None

7.1.1 Description

Rolls of paperboard are printed with graphic arts using one of the printing presses at the source.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Unit 01	Flexographic Printing Press #297 with 7.4 mmBtu/hr Natural Gas Fired Dryer	12/80 Last Modified 9/93	None
	Rotogravure Printing Press #507 with 8.0 mmBtu/hr Natural Gas Fired Dryer	2/73 Last Modified 12/96	None
	Rotogravure Printing Press #417 with 8.0 mmBtu/hr Natural Gas Fired Dryer	2/73 Last Modified 7/93	None

7.1.3 Applicability Provisions and Applicable Regulations

- a. The "affected printing lines" for the purpose of these unit-specific conditions, are each flexographic press (#297, #1372 and #826), each rotogravure printing press (#507 and #417) and associated dryer(s), used to perform roll printing. Each affected printing line is identified in Condition 7.1.2.
- b. Each affected printing line is subject to the requirements of 35 IAC Subpart H: Printing and Publishing. Each affected printing line shall comply with the limitations of 35 IAC 218.401(a)(2) as addressed in 35 IAC 218.401(b)(2). Each affected printing line complying by 35 IAC 218.401(b)(2) shall not apply coatings or inks unless the weighted average, by volume, VOM content of all coatings and inks as applied each day does not exceed twenty-five percent VOM by volume of the volatile content in the coating and ink.
 - i. The following equation shall be used to determine if the weighted average VOM content of all coatings and inks as applied each day on the affected printing line exceeds the

limitation of twenty-five percent VOM by volume of the volatile content in the coating and ink, specified by 35 IAC 218.401(a)(2):

$$VOM_{(i) (B)} = \frac{\sum_{i=1}^n C_i L_i V_{vmi}}{\sum_{i=1}^n L_i V_{vmi}}$$

Where:

$VOM_{(i) (B)}$ = The weighted average VOM content in units of percent VOM by volume of the volatile content of all coatings and inks used each day;

I = Subscript denoting a specific coating or ink as applied;

n = The number of different coatings and/or inks as applied each day on each affected printing line;

C_I = The VOM content in units of percent VOM by volume of the volatile matter in each coating or ink as applied;

L_i = The liquid volume of each coating or ink as applied in units of 1 (gal) and

V_{vmi} = The volume fraction of volatile matter in each coating or ink as applied.

- c. Each affected printing line is subject to 35 IAC 212.321(a), which provides that:
 - i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (see also Attachment 1) [35 IAC 212.321(a)].

- d. Each affected printing line is subject to the emission limits identified in Conditions 5.2.2 and 5.5.

7.1.4 Non-Applicability of Regulations of Concern

- a. The affected printing lines are not subject to 35 IAC 218.204(c), Coating Operations - Paper Coating, as the paper coating limitation does not apply to a line on which printing is performed which complies with the emission limitations in 35 IAC 218.401 [35 IAC 218.204(c)].
- b. This permit is issued based on the affected printing presses not being subject to 40 CFR 60, Subpart FFF - Standards of Performance for Flexible Vinyl and Urethane Coating and Printing, because the affected printing presses are not used to coat flexible vinyl or urethane products which excludes flexible packaging.
- c. The affected printing lines are not subject to meet the requirements of 35 IAC 218 Subpart G: Use of Organic Materials [35 IAC 218.402(b)].
- d. This permit is issued based on the affected printing lines not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected printing lines do not use an add-on control device to achieve compliance with an emission limitation or standard.

7.1.5 Operation and Control Requirements

Natural gas shall be the only fuel fired in the press dryer(s) of each affected printing line.

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected printing lines are subject to the following:

- a. i. The VOM content of specific groups of coatings and inks used on the new press shall not exceed the following limitations:
 - A. Conventional inks (all inks excluding varnishes and specialty inks) shall not exceed 1.1 lb VOM/gal, minus water and any compounds specifically exempt from the definition of VOM, as specified in 35 IAC 211: Definitions and General

Provisions, on a daily weighted average [T1];

- B. Varnishes shall not exceed 0.7 lb VOM/gal, minus water on a daily weighted average [T1]; and
 - C. Specialty inks (metallic and fluorescent inks) shall not exceed 3.0 lb/gal, minus water and any compounds specifically exempt from the definition of VOM, as specified in 35 IAC 211: Definitions and General Provisions, on a daily weighted average [T1].
- b. Emissions from affected printing line #507, including the emissions from the usage of clean-up solvents for the affected printing line, shall not exceed the following emission limitations:

VOM Emissions
(ton/12 months)

46.7

The above limitations contain revisions to previously issued construction permit 96090034. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this construction permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this construction permit does not constitute a new major source or major modification pursuant to these rules. These limits supersede the limitations established in this construction permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, VOM emissions have been changed from ton/365 days to ton/12 month so that compliance will be demonstrated on a monthly basis rather than a daily basis. This change results in no net increase in emissions [T1R].

- c. Emissions from affected printing line #417 shall not exceed the following emission limitations:

VOM Emissions
(ton/12 months)

113.0

The above limitations contain revisions to previously issued construction permit 93060022. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this construction permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this construction permit does not constitute a new major source or major modification pursuant to these rules. These limits supersede the limitations established in this construction permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, VOM emissions have been changed from ton/365 days to ton/12 month so that compliance will be demonstrated on a monthly basis rather than a daily basis. This change results in no net increase in emissions [T1R].

- d. Emissions from affected printing line #297 shall not exceed the following emission limitations:

VOM Emissions
(ton/12 months)

40.37

The above limitations contain revisions to previously issued construction permit 92120017. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this construction permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this construction permit does not constitute a new major source or major modification pursuant to these rules. These limits supersede the limitations established in this

construction permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, VOM emissions have been changed from ton/365 days to ton/12 month so that compliance will be demonstrated on a monthly basis rather than a daily basis. This change results in no net increase in emissions [T1R].

7.1.7 Testing Requirements

- a. The VOM content of each coating and ink shall be determined by the applicable test methods and procedures specified in 35 IAC 218.105(a) [35 IAC 218.401(a)].

7.1.8 Monitoring Requirements

None

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6 (particularly Condition 5.6.4 which requires the retention of records for five years), the Permittee shall maintain records of the following items for each affected printing line to address compliance with Conditions 5.5.1 and 7.1.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Each affected printing line is subject to the recordkeeping requirements of 35 IAC 218.404(d), which provides that the Permittee shall collect and record all of the following information each day for each printing line and maintain the information at the source for a period of three years:
 - i. The name and identification number of each coating and ink as applied on each printing line.
 - ii. The VOM content and the volume of each coating and ink as applied each day on each printing line.
 - iii. The daily-weighted average VOM content of all coatings and inks as applied on each printing line.
- b. The Permittee shall collect and record all of the following information each day for each affected printing line and maintain the information at the source for a period of three years:

- i. The name and identification number of each VOM containing material used.
 - ii. The VOM content (wt %) of each VOM containing material used.
 - iii. The usage of each VOM containing material, (lb/day).
 - iv. VOM emissions calculated in accordance with the procedures given in Condition 7.1.12 (lb/day and ton/yr).
- c. The owner or operator of an affected printing line shall collect and record all of the following information for the printing line dryers and maintain the information at the source for a period of three years:
- i. Fuel usage either directly measured or allocated from total facility gas usage using reasonable engineering estimates (mmscf/yr).
 - ii. Fuel combustion emissions calculated in accordance with the procedures given in Condition 7.1.12 (ton/yr).

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected printing line with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. The Permittee of an affected printing shall notify the Illinois EPA in the following instances:
 - i. Any record showing violation of Section 218.401(b)(2); as specified by Conditions 7.1.3(b) shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.
 - ii. At least 30 calendar days before changing the method of compliance with 35 IAC 218.401 from 35 IAC 218.401(b) to 35 IAC 218.401(a) or 35 IAC 218.401(c), the Permittee shall comply with all requirements of 35 IAC 218.404(c)(1) or (e)(1), respectively. Upon changing the method of compliance with 35 IAC 218.401 from 35 IAC 218.401(b) to 35 IAC 218.401(a) or (c),

the Permittee shall comply with all requirements of 35 IAC 218.404(c) or (e), respectively.

- b. Any record showing violation of the operating and control requirements of condition 7.1.5 and emission limitations of condition 7.1.6, shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

- a. Compliance with Condition 7.1.3(b) shall be addressed by the testing requirements of Condition 7.1.7.
- b. Compliance with Condition 7.1.3(c) is assumed to be achieved by the normal work practices and maintenance activities inherent in the operation of the affected printing lines.
- c. i. Compliance with Conditions 5.5 and 7.1.6 for each affected printing line shall be addressed by the recordkeeping requirements of Condition 7.1.9 and the formula(s) given below:

$$E_v = \sum_{i=1}^n C_i W_i$$

Where:

v = Printing Line Identification

n = The total number of VOM containing materials applied on affected printing line v

E_v = Total VOM emissions from affected printing line v

C_i = Quantity of VOM containing material, i, used on affected printing line v each day (lb/day)

W_i = VOM content of VOM containing material, i applied on affected printing line v each day (wt % VOM)

- ii. Compliance with the annual limits for each affected printing line #297, #507 and #417 shall be addressed on a monthly basis from the sum of the data for the current month plus the preceding 11 months.
- d. Compliance with Condition 5.5 for the affected printing line dryers emissions shall be addressed by the recordkeeping requirements of Condition 7.1.9 and the formula(s) given below:

$$E_p = FP_p * \left(\frac{\text{ton}}{2,000 \text{ lb}} \right)$$

Where:

- p = Pollutant type
- E_p = Emissions of pollutant type p from natural gas combustion (ton/yr)
- F = Natural gas usage (mmscf/yr)
- P_p = Emission factor for pollutant type p selected from the Table 1 below (lb/mmscf)

Table 1

Emission factors for natural gas combustion units with maximum firing rates from 0.3 mmBtu/hr to less than 10 mmBtu/hr from Fifth Edition of AP-42

Pollutant <u>Type</u>	Emission Factor <u>(lb/mmscf)</u>
NO _x	100
VOM	7.26
PM	11.9
SO ₂	0.6

7.2 Unit 02: BY-PRODUCT PAPERBOARD SEPARATOR
Control: Baghouse

7.2.1 Description

The paperboard separator segregates paper from the air stream and feeds it into a baler, which compresses the collected material and forms bales of paper. The air stream is exhausted inside the plant for energy recovery after passing through a fabric-filter baghouse. The bales of paper are bound with wire and shipped off-site for recycling.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Unit 02	By-Product Paperboard Separator (Recovery Unit)	7/95	Paperboard Baghouse

7.2.3 Applicability Provisions and Applicable Regulations

- a. The "affected recovery unit" for purpose of these unit specific conditions, is as listed in Condition 7.2.2.
- b. The affected recovery unit is subject to 35 IAC 212.321(b), which provides that:
 - i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (see also Attachment 1) [35 IAC 212.321(a)].
- c. The affected recovery unit is subject to 35 IAC 212.324(b), which provides that:
 - i. No person shall cause or allow the emission into the atmosphere, of PM-10, from any process emission unit to exceed 68.7 mg/scm (0.03 gr/scf) during any one hour period.
- d. The affected recovery unit is subject to the emission limits identified in Condition 5.2.2.

7.2.4 Non-Applicability of Regulations of Concern

This permit is issued based on the affected recovery unit not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected recovery unit does not have potential precontrol device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

7.2.5 Operational and Production Limits and Work Practices

- a. The Permittee shall follow good operating practices for the baghouse, including periodic inspection, routine maintenance and prompt repair of defects.
- b. The baghouse shall operate at all times in which an affected recovery unit is in operation.

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected recovery unit is subject to the following:

Emissions from the affected recovery unit shall not exceed the following emission limitations:

PM Emissions
(ton/yr)

0.44

The above limitation was established in Construction Permit 95060111, pursuant to Title I of the Clean Air Act, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to these rules [T1].

7.2.7 Testing Requirements

None

7.2.8 Monitoring Requirements

None

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items

for the affected recovery unit to address compliance with Condition 5.5.1 and 7.2.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Records addressing use of good operating practices for the dust collector:
 - i. Records for periodic inspection of the dust collector with date, individual performing the inspection, and nature of inspection; and
 - ii. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
- b. The operating schedule of the affected recovery unit; and
- c. The aggregate monthly and annual PM emissions from the affected recovery unit as addressed by the operating schedule and the typical hourly emission rate, with supporting calculations.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the affected recovery unit with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. Emissions of PM from the affected recovery unit in excess of the limits specified in Condition 5.5.1 based on the 12 months rolling period; and
- b. Emissions of PM from the affected recovery unit in excess of the limits specified in Condition 7.2.3 or 7.2.6, within 30 days of such an occurrence.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

- a. Compliance with Condition 7.2.3 is assumed to be achieved by work-practices inherent in operation of the affected recovery unit.

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.2.9 and the emission factors and formulas listed below:

To determine compliance with Condition 5.5, emissions from the affected recovery unit shall be calculated based on the following:

$$\text{PM} = (\text{Air Flow, cfm}) \times (\text{Estimated Dust Loading}^*, \text{ gr/scf}) \times (1 \text{ lb}/7,000 \text{ gr}) \times (60 \text{ minutes/hr}) \times [1 - (\text{Dust Collector Efficiency}^* (\%)/100)] \times \text{annual operating hours}$$

* As specified by manufacturer or vendor of the dust collector.

7.3 Unit 03: Five Natural Gas Fired Heaters
Control: None

7.3.1 Description

Natural gas fired heaters are being operated for purposes of space heating. The heaters are greater than 2.5 mmBtu/hr and below 10 mmBtu/hr in capacity.

7.3.2 List of Emission Equipment and Pollution Control Equipment

Emission Unit	Description	Date of Construction	Emission Control Equipment
Unit 03	Five Natural Gas Fired Make-Up Heaters with Combined Maximum Firing Rate of 19.4 mmBtu/hr	11/91	None

7.3.3 Applicability Provisions and Applicable Regulations

- a. An "affected heater" for the purpose of these unit specific conditions, is each heater listed in Condition 7.3.

7.3.4 Non-Applicability of Regulations of Concern

- a. The affected heaters are not subject to NSPS, 40 CFR 60 Subpart Dc, Small Industrial-Commercial-Institutional Steam Generating Units, since each steam generating has a heat input capacity of less than 2.9 MW (10 mmBtu/hr).
- b. The affected heaters are not subject to 35 IAC 216.121, emissions of carbon monoxide from fuel combustion emission sources, since the actual heat input from each heater is less than 2.9 MW (10 mmBtu/hr).
- c. The affected heaters are not subject to 35 IAC 217.141, Existing Emission Sources in Major Metropolitan Areas, since the actual heat input of the heaters is less than 73.2 MW (250 mmBtu/hr).
- d. The affected heaters are not subject to 35 IAC 215.301, Use of Organic Material, pursuant to 35 IAC 215.303, Fuel Combustion Emission Sources, which excludes the affected heaters from this requirement.

7.3.5 Operational and Production Limits and Work Practices

Natural gas shall be the only fuel fired in the affected heaters.

7.3.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the heaters are subject to the following:

None

7.3.7 Testing Requirements

None

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected heaters to demonstrate compliance with Condition 5.5.1 pursuant to Section 39.5(7)(b) of the Act:

- a. Fuel usage either directly measured or allocated from total facility gas usage using reasonable engineering estimates (mmscf/yr), and
- b. Fuel combustion emissions calculated in accordance with the procedures given in Condition 7.3.12 (ton/yr).

7.3.10 Reporting Requirements

If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences [Section 39.5(7)(f)(ii) of the Act].

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.3.12 Compliance Procedures

- a. Compliance with Condition 7.3.3(b) is assumed to be achieved by the work practices inherent in operation of a natural gas-fired heater, thus no compliance

procedures are set in this permit addressing this regulation.

- b. To determine compliance with Condition 5.5.1 emissions from the affected heaters shall be based on the emission factors listed below:

<u>Pollutant</u>	Natural Gas Emission Factors for Heaters Less than 10 mmBtu/hr	
	<u>(lb/10⁶ ft³)</u>	
NO _x	100	
PM	11.9	
SO ₂	0.6	
VOM	7.26	

These are the emission factors for uncontrolled natural gas combustion in heaters, Tables 1.4-1, 1.4-2, and 1.4-3, AP-42, Volume I, Supplement F, October, 1996.

Heater Emissions (lb) = (Natural Gas Consumed, ft³) x
(The Appropriate Emission Factor)

7.4 Unit 04: Flexographic Printing Line
Control: None

7.4.1 Description

The new printing press will be used to print paper board to produce cartons for canned and bottle beverages. The press central impression (CI) drum of the press has ten printing stations. Four to six print stations would be typically used to print different colors for any given order. Associated with each of the printing stations, is a between color dryer (BCD) to partially dry each color prior to printing the next color.

After the paper board is printed on the CI drum, it is directed through the bridge dryer box to complete drying.

The paperboard then goes to a backside print station, in which one or two colors can be printed on the backside of the web if the particular order requires any backside printing. The backside printer has a single dryer box for drying.

The web is then directed into a casting print station, which is capable of applying two different varnishes. There is a single dryer box after the first varnish is applied to partially dry it prior to the second varnish. After the second varnish is applied, the web is directed to a final dryer box to completely dry the web.

Each of the various dryers are served by three separate dryer systems. Each system consists of fresh air supply from above the roof, supply blower to feed air to the dryer system, natural gas burner downstream from supply blower, dryer boxes, and exhaust blower to extract hot air from dryer boxes.

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Unit 04	Flexographic Printing Press #3120 with Natural Gas-Fired Drying Systems (Total Capacity: 7.5 mmBtu/hour)	June, 2002	None

7.4.3 Applicability Provisions and Applicable Regulations

- a. The "affected printing line" for the purpose of these unit-specific conditions, is a flexographic press identified in Condition 7.4.1 and 7.4.2.

- b. Each affected printing line is subject to the requirements of 35 IAC Subpart H: Printing and Publishing. Each affected printing line shall comply with the limitations of 35 IAC 218.401(a) (2) as addressed in 35 IAC 218.401(b) (2).
- c. Each affected printing line is subject to 35 IAC 212.321(a), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (see also Attachment 1) [35 IAC 212.321(a)].

7.4.4 Non-Applicability of Regulations of Concern

- a. The affected printing lines are not subject to 35 IAC 218.204(c), Coating Operations – Paper Coating, as the paper coating limitation does not apply to a line on which printing is performed which complies with the emission limitations in 35 IAC 218.401 [35 IAC 218.204(c)].
- b. The affected printing lines are not subject to the requirements of 35 IAC 218 Subpart G: Use of Organic Materials because they are subject to 35 IAC 218.401 [35 IAC 218.402(b)].
- c. This permit is issued based on the net increase of VOM emissions from (1) the addition of affected printing line #3120 and (2) removal of line 1372, being 24.9 tons per year. Thus no major modification under 35 IAC 203 applies.
- d. This permit is issued based on the affected printing lines not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected printing lines do not use an add-on control device to achieve compliance with an emission limitation or standard.

7.4.5 Operation and Control Requirements

- a. Natural gas shall be the only fuel fired in the drying system of each affected printing line.

- b. Usage of VOM containing inks, varnish and solvents shall not exceed the following limits:

	VOM	
	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Inks, Varnish, and Solvents	5.0	30.8

Note: Due to the variable nature of VOM contained in inks, varnishes and solvent, specific quantities of the materials are not feasible. As a surrogate measure, VOM contained in the materials is used instead as the limitations.

7.4.6 Emission Limitations

The affected printing lines are subject to the following:

- a. Each affected printing line complying by 35 IAC 218.401(b) (2) shall not apply varnishes or inks unless the weighted average, by volume, VOM content of all varnishes and inks as applied each day does not exceed twenty-five percent VOM by volume of the volatile content in the varnish and ink [T1].
- b. Emissions of VOM from the affected printing line (#3120) shall not exceed the following emissions limitations. Compliance with the annual limit shall be addressed by a running total of 12 months of data [T1].

VOM Emissions	
<u>(Ton/Month)</u>	<u>(Ton/Year)</u>
5.0	30.8

The above limitations were established in Permit 01080013, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

- c. The Permittee shall utilize the automatic wash system of the new flexographic press (#3120), that utilizes water and low VOM cleaning material, in such a manner as to minimize the use of material containing VOM, including performing cleanup while the inks are still wet [T1].

- d. Emissions of NO_x and VOM from the affected printing line drying oven (#3120) shall not exceed the following limitations.

	<u>(Lbs/Hour)</u>	<u>(Tons/Year)</u>
NO _x	0.75	3.3
VOM	0.04	0.2

The above limitations were established in Permit 01080013, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

7.4.7 Testing Requirements

The VOM content of varnishes and inks shall be determined by the applicable test methods and procedures specified in 35 IAC 218.105(a) [35 IAC 218.401(a)].

7.4.8 Monitoring Requirements

None

7.4.9 Recordkeeping Requirements

- a. The Permittee shall collect and record all of the following information each day for each affected printing line: [35 IAC 218.404(d)(2)]
- i. The name and identification number of each VOM containing material used.
 - ii. The VOM content (wt %) of each VOM containing material used.
 - iii. The usage of each VOM containing material, (lb/day or gal/day).
 - iv. The daily-weighted average VOM content of all varnishes and inks as applied on each affected printing line.
 - v. VOM emissions calculated in accordance with the procedures given in Condition 7.4.12 (lb/day and ton/yr).
- b. The Permittee shall collect and record all of the following information for the printing line dryers

and maintain the information at the source for a period of three years:

- i. Fuel usage either directly measured or allocated from total facility gas usage using reasonable engineering estimates (mmscf/yr).
- ii. Fuel combustion emissions calculated in accordance with the procedures given in Condition 7.4.12 (ton/yr).

7.4.10 Reporting Requirements

- a. The Permittee shall notify the Illinois EPA when construction of the affected printing line (#3120) begins.
- b. The Permittee shall notify the Illinois EPA in the following instances:
 - i. Any record showing violation of Section 218.401(b)(2); as specified by Condition 7.4.3(b) shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.
 - ii. At least 30 calendar days before changing the method of compliance with 35 IAC 218.401 from 35 IAC 218.401(b) to 35 IAC 218.401(a) or 35 IAC 218.401(c), the Permittee shall comply with all requirements of 35 IAC 218.404(c)(1) or (e)(1), respectively. Upon changing the method of compliance with 35 IAC 218.401 from 35 IAC 218.401(b) to 35 IAC 218.401(a) or (c), the Permittee shall comply with all requirements of 35 IAC 218.404(c) or (e), respectively.
- c. The Permittee shall also promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected printing line with the applicable requirements. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

- a. Compliance with Condition 7.4.6 shall be addressed by the testing requirements of Condition 7.4.7 and the recordkeeping required by Condition 7.4.9.
- b. Compliance with Condition 7.4.3(c) is assumed to be achieved by the normal work practices and maintenance activities inherent in the operation of the affected printing lines.
- c. Compliance with Condition 7.4.6(a) for each affected printing line shall be addressed by the recordkeeping requirements of Condition 7.4.9 and the formula given below: The following equation shall be used to determine if the weighted average VOM content of all varnishes and inks as applied each day on the affected printing line exceeds the limitation of twenty-five percent VOM by volume of the volatile content in the varnish and ink, specified by 35 IAC 218.401(a) (2) :

$$VOM_{(i) (B)} = \frac{\sum_{i=1}^n C_i L_i V_{vmi}}{\sum_{i=1}^n L_i V_{vmi}}$$

Where:

$VOM_{(i) (B)}$ = The weighted average VOM content in units of percent VOM by volume of the volatile content of all varnish and inks used each day;

i = Subscript denoting a specific varnish or ink as applied;

n = The number of different varnishes and/or inks as applied each day on each affected printing line;

C_i = The VOM content in units of percent VOM by volume of the volatile matter in each varnish or ink as applied;

L_i = The liquid volume of each varnish or ink as applied in units of 1 (gal) and

V_{vmi} = The volume fraction of volatile matter in each varnish or ink as applied.

Note: This permit does not address other compliance options under 35 IAC 218.204 and 218.401 that are not relevant for the affected printing line.

- d. i. Compliance with Condition 1.1.6(b) for each affected printing line shall be addressed by the recordkeeping requirements of Condition 1.1.9 and the formula(s) given below:

$$E_v = \sum_{i=1}^n C_i W_i$$

Where:

v = Printing Line Identification

n = The total number of VOM containing materials applied on affected printing line v

E_v = Total VOM emissions from affected printing line v

C_i = Quantity of VOM containing material, i, used on affected printing line v each day (lb/day)

W_i = VOM content of VOM containing material, i applied on affected printing line v each day (wt % VOM)

- ii. Compliance with the annual limit for each affected printing line shall be addressed on a monthly basis from the sum of the data for the current month plus the preceding 11 months.

- e. Compliance with Condition 7.4.6(d) for the affected printing line shall be addressed by the recordkeeping requirements of Condition 7.4.9 and the formula(s) given below:

$$E_p = FP_p * \left(\frac{\text{ton}}{2,000 \text{ lb}} \right)$$

Where:

p = Pollutant

E_p = Emissions of pollutant P (ton)

F = Natural gas usage (mmscf)

P_p = Appropriate emission factor for pollutant
P (see below)

Emission factors for natural gas combustion units
with maximum firing rates from 0.3 mmBtu/hr to less
than 10 mmBtu/hr from Fifth Edition of AP-42

Pollutant <u>Type</u>	Emission Factor <u>(lb/mmscf)</u>
NO _x	100
VOM	5.5

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after March 21, 2004 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement [Section 39.5(7)(o)(vii) of the Act].

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes without applying for or obtaining an amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA, emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change, and the Permittee provides written

notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change [Section 39.5(12)(a) of the Act]. This notice shall:

- a. Describe the physical or operational change;
- b. Identify the schedule for implementing the physical or operational change;
- c. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
- d. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
- e. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

A report summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

<u>Monitoring Period</u>	<u>Report Due Date</u>
January - June	September 1
July - December	March 1

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;
- e. The test method(s), which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;

- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:
 - i. Illinois EPA - Air Compliance Section
 Illinois Environmental Protection Agency
 Bureau of Air
 Compliance Section (MC 40)
 P.O. Box 19276
 Springfield, Illinois 62794-9276
 - ii. Illinois EPA - Air Regional Field Office
 Illinois Environmental Protection Agency
 Division of Air Pollution Control
 9511 West Harrison
 Des Plaines, Illinois 60016
 - iii. Illinois EPA - Air Permit Section (MC 11)
 Illinois Environmental Protection Agency
 Division of Air Pollution Control
 Permit Section
 P.O. Box 19506
 Springfield, Illinois 62794-9506
 - iv. USEPA Region 5 - Air Branch
 USEPA (AE - 17J)
 Air & Radiation Division
 77 West Jackson Boulevard
 Chicago, Illinois 60604
- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

- 9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule [Section 39.5(7)(j)(iv) of the Act].
- 9.1.2 In particular, this permit does not alter or affect the following:
 - a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;
 - b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and
 - d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.
- 9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated thereunder.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(p)(ii) of the Act]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control

equipment), practices, or operations regulated or required under this permit;

- d. Sample or monitor any substances or parameters at any location:
 - i. At reasonable times, for the purposes of assuring permit compliance; or
 - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source.

9.4 Obligation to Comply With Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

9.5 Liability

9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7) (o) (iv) of the Act].

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12) (b) (iv) of the Act].

9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7) (e) (ii) of the Act].
- b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7) (p) (v) of the Act, the Permittee shall submit compliance certifications annually or more frequently as specified in the applicable requirement or by permit condition.

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:
 - i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;
 - ii. The permitted source was at the time being properly operated;
 - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission

limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and

iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.

b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;

- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and
- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(b) of the Act.

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(1), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1 Attachment 1 Emissions of Particulate Matter from New Process Emission Units

10.1.1 Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972

- a. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].
- b. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.321(b)]:

$$E = A(P)^B$$

Where:

P = Process weight rate; and

E = Allowable emission rate; and,

- i. Up to process weight rates of 408 Mg/hr (450 ton/hr):

	Metric	English
P	Mg/hr	ton/hr
E	kg/hr	lb/hr
A	1.214	2.54
B	0.534	0.534

- ii. For process weight rate greater than or equal to 408 Mg/hr (450 ton/hr):

	Metric	English
P	Mg/hr	ton/hr
E	kg/hr	lb/hr
A	11.42	24.8
B	0.16	0.16

c. Limits for Process Emission Units for Which
Construction or Modification Commenced On or After
April 19, 1972 [35 IAC 212.321(c)]:

Metric		English	
P	E	P	E
Mg/hr	kg/hr	ton/hr	lb/hr
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.2	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.0	3.9	10.00	8.70
13.0	4.8	15.00	10.80
18.0	5.7	20.00	12.50
23.0	6.5	25.00	14.00
27.0	7.2	30.00	15.60
32.0	7.7	35.00	17.00
36.0	8.2	40.00	18.20
41.0	8.8	45.00	19.20
45.0	9.3	50.00	20.50
90.0	13.4	100.00	29.50
140.0	17.0	150.00	37.00
180.0	19.4	200.00	43.00
230.0	22.0	250.00	48.50
270.0	24.0	300.00	53.00
320.0	26.0	350.00	58.00
360.0	28.0	400.00	62.00
408.0	30.1	450.00	66.00
454.0	30.4	500.00	67.00

10.2 Attachment 2 Emissions of Particulate Matter from Existing Process Emission Units

10.2.1 Process Emission Units for Which Construction or Modification Commenced Prior to After April 14, 1972

- a. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 [35 IAC 212.322(a)].
- b. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.322(b)]:

$$E = C + A(P)^B$$

Where:

P = Process weight rate; and
E = Allowable emission rate; and,

- i. Up to process weight rates up to 27.2 Mg/hr (30 ton/hr):

	Metric	English
P	Mg/hr	ton/hr
E	kg/hr	lb/hr
A	1.985	4.10
B	0.67	0.67
C	0	0

- ii. For process weight rate in excess of 27.2 Mg/hr (30 ton/hr):

	Metric	English
P	Mg/hr	ton/hr
E	kg/hr	lb/hr
A	25.21	55.0
B	0.11	0.11
C	-18.4	-40.0

- c. Limits for Process Emission Units for Which Construction or Modification Commenced Prior to April 14, 1972 [35 IAC 212.322(c)]:

Metric		English	
P	E	P	E
Mg/hr	kg/hr	ton/hr	lb/hr
0.05	0.27	0.05	0.55
0.1	0.42	0.10	0.87
0.2	0.68	0.2	1.40
0.3	0.89	0.30	1.83
0.4	1.07	0.40	2.22
0.5	1.25	0.50	2.58
0.7	1.56	0.75	3.38
0.9	1.85	1.00	4.10
1.8	2.9	2.00	6.52
2.7	3.9	3.00	8.56
3.6	4.7	4.00	10.40
4.5	5.4	5.00	12.00
9.0	8.7	10.00	19.20
13.0	11.1	15.00	25.20
18.0	13.8	20.00	30.50
23.0	16.2	25.00	35.40
27.2	18.15	30.00	40.00
32.0	18.8	35.00	41.30
36.0	19.3	40.00	42.50
41.0	19.8	45.00	43.60
45.0	20.2	50.00	44.60
90.0	23.2	100.00	51.20
140.0	25.3	150.00	55.40
180.0	26.5	200.00	58.60
230.0	27.7	250.00	61.00
270.0	28.5	300.00	63.10
320.0	29.4	350.00	64.90
360.0	30.0	400.00	66.20
400.0	30.6	450.00	67.70
454.0	31.3	500.00	69.00

10.3 Attachment 3 Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

10.4 Attachment 4 Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

1. Administrative Permit Amendment;
2. Minor Permit Modification; and
3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

1. Administrative Permit Amendment
 - Corrects typographical errors;
 - Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
 - Requires more frequent monitoring or reporting by the Permittee;
 - Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA. This shall be handled by completing form 272-CAAPP, REQUEST FOR OWNERSHIP CHANGE FOR CAAPP PERMIT; or
 - Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits.
2. Minor Permit Modification
 - Do not violate any applicable requirement;
 - Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;
- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and
 - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.
- Are not modifications under any provision of Title I of the CAA;
- Are not required to be processed as a significant permit modification; and
- Modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches.

An application for a minor permit modification shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;
- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
- Information as contained on form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT for the Illinois EPA to use to notify USEPA and affected States.

3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;
- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

- A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or
- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or
- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

Application forms can be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms>.

Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.



Illinois Environmental Protection Agency
Division Of Air Pollution Control -- Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506

Application For Construction Permit (For CAAPP Sources Only)	For Illinois EPA use only
	ID number:
	Permit number:
	Date received:

This form is to be used by CAAPP sources to supply information necessary to obtain a construction permit. Please attach other necessary information and completed CAAPP forms regarding this construction/modification project.

Source Information		
1. Source name:		
2. Source street address:		
3. City:	4. Zip code:	
5. Is the source located within city limits? <input type="checkbox"/> Yes <input type="checkbox"/> No		
6. Township name:	7. County:	8. ID number:

Owner Information		
9. Name:		
10. Address:		
11. City:	12. State:	13. Zip code:

Operator Information (if different from owner)		
14. Name		
15. Address:		
16. City:	17. State:	18. Zip code:

Applicant Information	
19. Who is the applicant? <input type="checkbox"/> Owner <input type="checkbox"/> Operator	20. All correspondence to: (check one) <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Source
21. Attention name and/or title for written correspondence:	
22. Technical contact person for application:	23. Contact person's telephone number:

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

Summary Of Application Contents	
24.	Does the application address whether the proposed project would constitute a new major source or major modification under each of the following programs: a)Non-attainment New Source Review – 35 IAC Part 203; b)Prevention of Significant Deterioration (PSD) – 40 CFR 52.21; c)Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63?
	<input type="checkbox"/> Yes <input type="checkbox"/> No
25.	Does the application identify and address all applicable emissions standards, including those found in the following: a)Board Emission Standards – 35 IAC Chapter I, Subtitle B; b)Federal New Source Performance Standards – 40 CFR Part 60; c)Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63?
	<input type="checkbox"/> Yes <input type="checkbox"/> No
26.	Does the application include a process flow diagram(s) showing all emission units and control equipment, and their relationship, for which a permit is being sought?
	<input type="checkbox"/> Yes <input type="checkbox"/> No
27.	Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?
	<input type="checkbox"/> Yes <input type="checkbox"/> No
28.	Does the application include the information as contained in completed CAAPP forms for all appropriate emission units and air pollution control equipment, listing all applicable requirements and proposed exemptions from otherwise applicable requirements, and identifying and describing any outstanding legal actions by either the USEPA or the Illinois EPA? Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information.
	<input type="checkbox"/> Yes <input type="checkbox"/> No
29.	If the application contains TRADE SECRET information, has such information been properly marked and claimed, and have two separate copies of the application suitable for public inspection and notice been submitted, in accordance with applicable rules and regulations?
	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable, No TRADE SECRET information in this application

Note 1: Answering "No" to any of the above may result in the application being deemed incomplete.

Signature Block	
This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.	
30. I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete. Authorized Signature:	
I	
_____	_____
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
_____	_____/_____/_____
TYPED OR PRINTED NAME OF SIGNATORY	DATE

Note 2: An operating permit for the construction/modification permitted in a construction permit must be obtained by applying for the appropriate revision to the source's CAAPP permit, if necessary.

10.6 Attachment 6 Guidance on Renewing This Permit

Timeliness - Pursuant to Section 39.5(5)(n) of the Act and 35 IAC 270.301(d), a source must submit to the Illinois EPA a complete CAAPP application for the renewal of a CAAPP permit not later than 9 months before the date of permit expiration of the existing CAAPP permit in order for the submittal to be deemed timely. Note that the Illinois EPA typically sends out renewal notices approximately 18 months prior to the expiration of the CAAPP permit.

The CAAPP application must provide all of the following information in order for the renewal CAAPP application to be deemed complete by the Illinois EPA:

1. A completed renewal application form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.
2. A completed compliance plan form 293-CAAPP, COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR CAAPP PERMIT.
3. A completed compliance certification form 296-CAAPP, COMPLIANCE CERTIFICATION, signed by the responsible official.
4. Any applicable requirements that became effective during the term of the permit and that were not included in the permit as a reopening or permit revision.
5. If this is the first time this permit is being renewed and this source has not yet addressed CAM, the application should contain the information on form 464-CAAPP, COMPLIANCE ASSURANCE MONITORING (CAM) PLAN.
6. Information addressing any outstanding transfer agreement pursuant to the ERMS.
7.
 - a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. This letter must also include a statement that information incorporated by reference is also being certified for truth and accuracy by the responsible official's signing of the form 200-CAAPP, APPLICATION FOR CAAPP PERMIT and the form 296-CAAPP, COMPLIANCE CERTIFICATION. The boxes should be marked yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT,

as existing information is being incorporated by reference.

- b. If portions of current operations are not as described in previous submittals, then in addition to the information above for operations that remain unchanged, the application must contain the necessary information on all changes, e.g., discussion of changes, new or revised CAAPP forms, and a revised fee form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT, if necessary.
8. Information about all off-permit changes that were not prohibited or addressed by the permit to occur without a permit revision and the information must be sufficient to identify all applicable requirements, including monitoring, recordkeeping, and reporting requirements, for such changes.
9. Information about all changes made under 40 CFR 70.4(b)(12)(i) and (ii) that require a 7-day notification prior to the change without requiring a permit revision.

The Illinois EPA will review all applications for completeness and timeliness. If the renewal application is deemed both timely and complete, the source shall continue to operate in accordance with the terms and conditions of its CAAPP permit until final action is taken on the renewal application.

Notwithstanding the completeness determination, the Illinois EPA may request additional information necessary to evaluate or take final action on the CAAPP renewal application. If such additional information affects your allowable emission limits, a revised form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT must be submitted with the requested information. The failure to submit to the Illinois EPA the requested information within the time frame specified by the Illinois EPA, may force the Illinois EPA to deny your CAAPP renewal application pursuant to Section 39.5 of the Act.

Application forms may be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms.html>.

If you have any questions regarding this matter, please contact a permit analyst at 217/782-2113.

Mail renewal applications to:

Illinois Environmental Protection Agency
Division of Air Pollution Control

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Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506

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